North Atlantic

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The Northeast Utilities System

August 9, 2001

Docket No. 50-443

NYN-01051

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Seabrook Station
License Amendment Request 01-06
"Changes To The Technical Specifications On Refueling Operations"

North Atlantic Energy Service Corporation (North Atlantic) has enclosed herein License Amendment Request (LAR) 01-06. License Amendment Request 01-06 is submitted pursuant to the requirements of 10 CFR 50.90 and 10 CFR 50.4.

LAR 01-06 proposes changes to the Seabrook Station Technical Specifications (TS) Index, TS 3/4.9.3 ("Decay Time"), TS 3/4.9.4 ("Containment Building Penetrations"), and TS 3/4.9.9 ("Containment Purge And Exhaust Isolation System"). LAR 01-06 also contains changes to Bases 3/4.9.3, Bases 3/4.9.4, and Bases 3/4.9.9 for consistency with the proposed TS changes.

The purpose of LAR 01-06 is to update the Technical Specifications by adopting portions of NUREG-1431, Revision 2 ("Standard Technical Specifications, Westinghouse Plants") pertaining to refueling operations.

The Station Operation Review Committee and the Nuclear Safety Audit Review Committee have reviewed LAR 01-06.

As discussed in the enclosed LAR Section IV, the proposed change does not involve a significant hazard consideration pursuant to 10 CFR 50.92. A copy of this letter and the enclosed LAR has been forwarded to the New Hampshire State Liaison Officer pursuant to 10 CFR 50.91(b). North Atlantic requests NRC Staff review of LAR 01-06, and issuance of a license amendment by January 9, 2002 (see Section V enclosed).

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North Atlantic has determined that LAR 01-06 meets the criterion of 10 CFR 51.22(c)(9) for a categorical exclusion from the requirements for an Environmental Impact Statement (see Section VI enclosed).

Should you have any questions regarding this letter, please contact Mr. James M. Peschel, Manager - Regulatory Programs, at (603) 773-7194.

Very truly yours,
NORTH ATLANTIC ENERGY SERVICE CORP.

Ted C. Feigenbaum
Executive Vice President
and Chief Nuclear Officer

cc:

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North Atlantic

SEABROOK STATION UNIT 1

Facility Operating License NPF-86
Docket No. 50-443

License Amendment Request 01-06,
"Changes To The Technical Specifications On Refueling Operations"

This License Amendment Request is submitted by North Atlantic Energy Service Corporation pursuant to 10CFR50.90. The following information is enclosed in support of this License Amendment Request:

- Section I - Introduction and Safety Assessment for Proposed Changes
- Section II - Markup of Proposed Changes
- Section III - Retype of Proposed Changes
- Section IV - Determination of Significant Hazards for Proposed Changes
- Section V - Proposed Schedule for License Amendment Issuance And Effectiveness
- Section VI - Environmental Impact Assessment

I, Ted C. Feigenbaum, Executive Vice President and Chief Nuclear Officer of North Atlantic Energy Service Corporation hereby affirm that the information and statements contained within this License Amendment Request are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.

Ted C. Feigenbaum
Executive Vice President
and Chief Nuclear Officer

Sworn and Subscribed
before me this
9th day of August, 2001

Marilyn R. Sullivan
Notary Public

SECTION I

INTRODUCTION AND SAFETY ASSESSMENT FOR PROPOSED CHANGES

I. INTRODUCTION AND SAFETY ASSESSMENT OF PROPOSED CHANGES

A. Introduction

License Amendment Request (LAR) 01-06 proposes changes to the Seabrook Station Technical Specifications (TS) Index, TS 3/4.9.3 ("Decay Time"), TS 3/4.9.4 ("Containment Building Penetrations"), and TS 3/4.9.9 ("Containment Purge And Exhaust Isolation System"). LAR 01-06 also contains changes to Bases 3/4.9.3, Bases 3/4.9.4, and Bases 3/4.9.9 for consistency with the proposed TS changes.

The purpose of LAR 01-06 is to update the Technical Specifications by adopting portions of the improved Standard Technical Specifications (ITS), NUREG-1431, Revision 2 ("Standard Technical Specifications, Westinghouse Plants") pertaining to refueling operations.

The proposed changes to TS 3/4.9.3, "Decay Time," and associated Bases 3/4.9.3 are to delete the requirements from the Technical Specifications (TSs) and relocate them to the Seabrook Station Technical Requirements Manual (SSTR). The decay time requirement is not contained in NUREG-1431, Revision 2.

The NRC's "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" (58 FR 39312), issued in July 1993, provided a specific set of four (4) objective criteria to determine which of the design conditions and associated surveillances should be located in the TSs as limiting conditions for operation. The Final Policy Statement noted that implementation of these additional criteria, as amended to 10 CFR 50.36(c)(2)(ii), may cause some requirements presently in TSs to no longer merit inclusion in TSs.

The SSTR is a licensee-controlled document, which contains certain technical requirements, is referenced in the Seabrook Station Updated Final Safety Analysis Report, and is the implementing manual for the Technical Specification Improvement Program. Changes to these requirements are reviewed and approved in accordance with Seabrook Station Technical Specifications, Section 6.7.1.i, and as outlined in North Atlantic's administrative programs and procedures. Specifically, changes to the SSTR require review pursuant to 10 CFR 50.59 and that the changes are reviewed and approved by the Station Operations Review Committee (SORC) prior to implementation.

The proposed changes to TS 3/4.9.4, "Containment Building Penetrations," and TS 3/4.9.9, "Containment Purge and Exhaust Isolation System," are to combine both specifications under TS 3/4.9.4 in order to be similar to ITS 3.9.4 ("Containment Penetrations") where both specifications have been combined, as well as provide clarity. The proposed change will also allow removal of an administrative control currently in place with regard to the 36-inch diameter containment purge and exhaust isolation valves.

The changes to the TS Index are editorial and reflect the other changes discussed herein.

B. Safety Assessment of Proposed Changes

NUREG-1431, Rev. 2 contains the improved Standard Technical Specifications (STS) for Westinghouse plants. This revision incorporates the cumulative changes to Revision 1, which was published in April 1995. The changes reflected in Revision 2 resulted from the experience gained from license amendment applications to convert to these improved STS or to adopt partial improvements to existing technical specifications. NUREG-1431, Rev. 2 is the result of extensive public technical meetings and discussions among the Nuclear Regulatory Commission (NRC) staff and various nuclear power plant licensees, Nuclear Steam Supply System (NSSS) Owners Groups, and the Nuclear Energy Institute (NEI). The improved STS were developed based on the criteria in the Final Commission Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors, dated July 22, 1993 (58 FR 39132), which was subsequently codified by changes to Section 36 of Part 50 of Title 10 of the *Code of Federal Regulations* (10 CFR 50.36) (60 FR 36953). The Final Policy Statement provided a specific set of four (4) objective criteria to determine which of the design conditions and associated surveillances should be located in the TSs as limiting conditions for operation. The Final Policy Statement noted that implementation of these additional criteria, as amended to 10 CFR 50.36(c)(2)(ii), may cause some requirements presently in TSs to no longer merit inclusion in TSs.

The proposed changes to relocate TS 3/4.9.3 ("Decay Time") to the SSTR and incorporate TS 3/4.9.9 ("Containment Purge And Exhaust Isolation System") into TS 3/4.9.4 are administrative in nature to update the Seabrook Station Technical Specifications to current regulatory practice, as reflected in NUREG 1431, Rev. 2.

The SSTR is a licensee-controlled document, which contains certain technical requirements, is referenced in the Seabrook Station Updated Final Safety Analysis Report, and is the implementing manual for the Technical Specification Improvement Program. Changes to these requirements are reviewed and approved in accordance with Seabrook Station Technical Specifications, Section 6.7.1.i, and as outlined in North Atlantic's administrative programs and procedures. Specifically, changes to the SSTR require review pursuant to 10 CFR 50.59 and that the changes are reviewed and approved by the Station Operations Review Committee (SORC) prior to implementation.

Relocation of TS 3/4.9.3 to the SSTR is justified based on the following historical information:

> WOG letter OG-87-43 dated 11/12/87, submitted WCAP-11618 for NRC review. This topical report contained the Criteria Application, MERITS Program Phase II, Task 5. At that time STS 3/4.9.3, Decay Time, was shown as satisfying Criterion 2 as an initial condition. Addendum 1 to WCAP-11618 (OG-89-26 dated 4/21/89) contained the often-cited Murley letter of 5/9/88 that also indicated STS LCO 3.9.3, Decay Time, must be retained because of Criterion 2. At some point between spring 1989 and summer 1991 the requirement to retain a Decay Time LCO was negotiated away. WCAP-13029, July 1991, contained the results of the MERITS Program Phase III, Comments on Draft NUREG-1431, by which time the

Decay Time LCO had been dropped. The four loop owners group (FLOG) plants' (Callaway, Wolf Creek, Comanche Peak, Diablo Canyon) description of change (DOC) 3-01-R for relocation was modified in response to NRC RAI Q 3.9-5 to state that, although decay time was in fact an initial condition, industry and NRC had agreed to relocate this LCO during the initial development of NUREG-1431.

The proposed changes to TS 3/4.9.4, "Containment Building Penetrations," and TS 3/4.9.9, "Containment Purge and Exhaust Isolation System," are to combine both specifications under TS 3/4.9.4 in order to be similar to ITS 3.9.4 ("Containment Penetrations") where both specifications have been combined. Additionally, by combining both TSs, it is proposed to add a footnote to TS 4.9.4b (i.e., "** Not required for those valves complying with Specification 3.9.4.c.1 or Specification 3.9.4.c.3.") so that the surveillance requirement relocated from TS 3/4.9.9 will continue to only pertain to those automatic isolation valves controlled by the Containment Purge and Exhaust Isolation System which are OPERABLE.

By combining TS 3/4.9.4 and 3/4.9.9 and incorporating wording similar to ITS 3/4.9.4, as well as the proposed ** footnote to TS 4.9.4b, North Atlantic recognizes an apparent relaxation in surveillance testing between proposed TS 4.9.4b and current TS 4.9.9. The relaxation (additional flexibility) allowed by ITS surveillance requirement (SR) 3.9.4.2 only requires verification of automatic valve isolation capability once (up to an 18-month frequency) for the testing of the automatic isolation function. This is in comparison to current TS 4.9.9 which requires Operability demonstration of containment purge and isolation function 100 hours prior to the start of and once per 7 days during CORE ALTERATIONS. The 18-month Frequency maintains consistency with other similar Engineered Safety Features Actuation System (ESFAS) instrumentation and valve testing requirements. To assure continued conservatism, because of the resulting relaxation, North Atlantic proposes to add an additional requirement for testing the automatic isolation function within 10 days prior to CORE ALTERATIONS. North Atlantic is implementing this requirement as a prudent measure to assure timely testing of the system prior to a refueling outage. Though the proposed 10-day window is less conservative than the current 100 hour window with re-verification at least once every 7 days, it is more conservative than the approved ITS version. Re-verification of automatic isolation capability at least once every 7 days is very conservative in light of the fact that proposed TS 4.9.4a will continue to assure that all penetrations, including the containment purge and exhaust isolation system valves, are in their required condition on a 7-day frequency. This surveillance for the open purge and exhaust isolation valves will demonstrate the valves are not blocked from closing. Also the surveillance will demonstrate that each valve operator has motive power which will assure that each valve is capable of being closed by an isolation signal. This surveillance in conjunction with the shiftly channel checks required by TS 3/4.3.3.1, Radiation Monitoring Instrumentation, and a quarterly digital channel operational test and a channel calibration on a refueling frequency provides adequate assurance that the containment purge and exhaust isolation valves will close in response to an isolation signal. In addition, the Inservice Testing (IST) Program pursuant to TS 4.0.5 demonstrates the isolation time of each automatic containment penetration isolation valve. Therefore, North Atlantic believes that the additional relaxation gained as allowed by current regulatory practice in NUREG-1431, Rev. 2, coupled with the proposed added conservatism and surveillance testing per TS 3/4.3.3.1 and TS 4.0.5, that the proposed changes do not involve a

significant safety hazard. In addition, the 10-day window affords North Atlantic scheduling flexibility for preparation of refueling outage activities.

The proposed ** footnote to TS 4.9.4b will exempt operability verification of the automatic isolation function for those automatic isolation valves that are either closed per LCO 3.9.3c.1) or under administrative control by use of a designated individual for isolation of penetrations up to 12 inches in diameter per LCO 3.9.4c.3). It is not necessary to verify the automatic isolation function of automatic valves that are either in their required safety position (i.e., closed) or under direct manual control by a designated individual. This reasoning is similar with the footnote in ITS SR 3.9.4.2. For those automatic isolation valves that are open (including the 36-inch diameter CAP valves) and not under the direct control of a designated individual, LCO 3.9.4c.2) will continue to assure that these valves are capable of being closed by an OPERABLE automatic Containment Purge and Exhaust Isolation System. The proposed footnote does not change operational methods currently allowed by the current licensing basis, therefore, the proposed change does not involve a significant safety hazard

The current licensing basis (as amended by Amendment No. 40) allows use of an alternate containment building penetration closure method during refueling outages, i.e., use of a designated individual. The inside containment fuel handling accident analysis evaluated manual isolation of penetrations up to a 12-inch diameter size with the use of a designated individual within an assumed closure time to assure radiological doses remain well below 10 CFR Part 100 limits. However, with respect to the 36-inch diameter CAP valves, a designated individual cannot be used since manual closure would most likely exceed the assumed closure time. As a result, a note is being added to TS 3.9.4.c.3 (i.e., "A designated individual shall not be used for manual isolation of valves CAP-V1, CAP-V2, CAP-V3, and/or CAP-V4"). Presently, administrative controls are established as an interim measure until receipt of a license amendment to assure the alternate closure method is not utilized for manual isolation of the 36-inch diameter CAP valves.

The above surveillances and limiting conditions for operation and administrative controls associated with the Containment Purge and Exhaust Isolation System assure that the valves are capable of closing after a postulated fuel handling accident to limit a release of fission product radioactivity from the containment.

North Atlantic concludes that based upon the above discussion as well as the Determination of Significant Hazards for Proposed Changes, presented in Section IV, that the proposed changes do not adversely affect or endanger the health or safety of the general public or involve a significant safety hazard.

SECTION II

MARKUP OF PROPOSED CHANGES

Refer to the attached markup of the proposed changes to the Technical Specifications. The attached markup reflects the currently issued revision of the Technical Specifications listed below. Pending Technical Specifications or Technical Specification changes issued subsequent to this submittal are not reflected in the enclosed markup.

The following Technical Specification changes are included in the attached markup:

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3/4.9.3 ~~DECAY TIME~~

(This specification number is not used.)

LIMITING CONDITION FOR OPERATION

3.9.3 The reactor shall be subcritical for at least 100 hours.

APPLICABILITY: During movement of irradiated fuel in the reactor vessel.

ACTION:

With the reactor subcritical for less than 100 hours, suspend all operations involving movement of irradiated fuel in the reactor vessel.

SURVEILLANCE REQUIREMENTS

4.9.3 The reactor shall be determined to have been subcritical for at least 100 hours by verification of the date and time of subcriticality prior to movement of irradiated fuel in the reactor vessel.

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS

LIMITING CONDITION FOR OPERATION

3.9.4 The containment building penetrations shall be in the following status:

a. The equipment door closed and held in place by a minimum of four bolts,

b. A minimum of one door in each airlock is closed, however both doors of one personnel airlock may be open if:

1) One personnel airlock door is capable of being closed, and

2) A designated individual is available outside the personnel airlock to close the door.

c. Each penetration providing direct access from the containment atmosphere to the outside atmosphere shall be either:

1) Closed by a manual or automatic isolation valve, blind flange, or equivalent; or

2) Be capable of being closed by an OPERABLE automatic containment purge and exhaust isolation ~~valve;~~ or System;

3) Be capable of being closed by a designated individual available at the penetration. *

APPLICABILITY: During CORE ALTERATIONS or movement of irradiated fuel within the containment.

ACTION:

With the requirements of the above specification not satisfied, immediately suspend all operations involving CORE ALTERATIONS or movement of irradiated fuel in the containment building.

SURVEILLANCE REQUIREMENTS

~~4.9.4 Each of the above required containment building penetrations shall be determined to be either in its required condition or capable of being closed by an OPERABLE automatic containment purge and exhaust isolation valve within 100 hours prior to the start of and at least once per 7 days during CORE ALTERATIONS or movement of irradiated fuel in the containment building by:~~

~~a. Verifying the penetrations are in their required condition, or~~

~~b. Testing the containment purge and exhaust isolation valves per the applicable portions of Specification 4.6.3.2.~~

INSERT A

INSERT A

4.9.4 For the above required containment building penetrations:

a. Determine that each of the above required containment building penetrations shall be in its required condition within 100 hours prior to the start of, and at least once per 7 days during, CORE ALTERATIONS or movement of irradiated fuel in the containment building, and

b. Demonstrate that the Containment Purge and Exhaust Isolation System is OPERABLE at least once every 18 months and within 10 days prior to the start of CORE ALTERATIONS or movement of irradiated fuel in the containment building by verifying that containment purge and exhaust isolation occurs on manual initiation and on a High Radiation test signal from each of the manipulator crane radiation area monitoring instrumentation channels.**

---

* A designated individual shall not be used for manual isolation of valves CAP-V1, CAP-V2, CAP-V3, and/or CAP-V4.

** Not required for those valves complying with Specification 3.9.4.c.1 or Specification 3.9.4.c.3.

(This specification number is not used.)

3/4.9.9 ~~CONTAINMENT PURGE AND EXHAUST ISOLATION SYSTEM~~

LIMITING CONDITION FOR OPERATION

3.9.9 The Containment Purge and Exhaust Isolation System shall be OPERABLE.

APPLICABILITY: During CORE ALTERATIONS or movement of irradiated fuel within the containment.

ACTION:

a. With the Containment Purge and Exhaust Isolation System inoperable, close each of the purge and exhaust penetrations providing direct access from the containment atmosphere to the outside atmosphere.

b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.9 The Containment Purge and Exhaust Isolation System shall be demonstrated OPERABLE within 100 hours prior to the start of and at least once per 7 days during CORE ALTERATIONS by verifying that containment purge and exhaust isolation occurs on manual initiation and on a High Radiation test signal from each of the manipulator crane area radiation monitoring instrumentation channels.

3/4.9.2 INSTRUMENTATION

The OPERABILITY of the Source Range Neutron Flux Monitors ensures that redundant monitoring capability is available to detect changes in the reactivity condition of the core.

3/4.9.3 ~~DECAY TIME~~ (THIS SPECIFICATION NUMBER IS NOT USED.)

~~The minimum requirement for reactor subcriticality prior to movement of irradiated fuel assemblies in the reactor vessel ensures that sufficient time has elapsed to allow the radioactive decay of the short lived fission products. This decay time is consistent with the assumptions used in the safety analyses.~~

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS

The Limiting Condition for Operation (LCO) limits the consequences of a fuel handling accident in containment by limiting the potential escape paths for fission product radioactivity released within containment. The LCO requires any penetration providing direct access from the containment atmosphere to the outside atmosphere to be closed except for the OPERABLE containment purge and exhaust penetrations, the approved alternate closure methods and the containment personnel airlock.

For the approved alternate closure methods, the LCO requires that a designated individual must be available to close or direct the remote closure of the penetration in the event of a fuel handling accident. "Available" means stationed at the penetration or performing activities controlled by a procedure on equipment associated with the penetration. INSERT B

For the personnel airlocks (containment or equipment hatch), the LCO ensures that the airlock can be closed after containment evacuation in the event of a fuel handling accident. The requirement that the airlock door is capable of being closed requires that the door can be closed and is not blocked by objects that cannot be easily and quickly removed. As an example, the use of removable protective covers for the door seals and sealing surfaces is permitted. The requirement for a designated individual located outside of the airlock area available to ~~lose~~ close the door following evacuation of the containment will minimize the release of radioactive material.

The fuel handling accident analysis inside containment assumes both of the personnel airlock doors are open and an additional 12" diameter penetration (or equivalent area) is open. The analysis is bounded by these assumptions since all of the available activity is released within a 2 hour period.

Insert paragraph from pg B 3/4 9-4 here.

INSERT B

The inside containment fuel handling accident analysis provides assurance that manual isolation of penetration valves up to a 12-inch diameter size, within the assumed time, can be attained with the use of a designated individual. With respect to the 36-inch diameter CAP valves, a designated individual is not allowed since manual closure would most likely exceed the assumed closure time.

(THIS SPECIFICATION NUMBER IS NOT USED)

BASES

INSERT INTO BASES 3/4.9.9 ON PAGE B 3/4 9-2A

3/4.9.9 ~~CONTAINMENT PURGE AND EXHAUST ISOLATION SYSTEM~~ THE CONTAINMENT PURGE AND EXHAUST ISOLATION SYSTEM

The OPERABILITY of ~~this system~~ ensures that the containment vent and purge penetrations will be automatically isolated upon detection of high radiation levels within the containment. The OPERABILITY of this system is required to restrict the release of radioactive material from the containment atmosphere to the environment.

3/4.9.10 and 3/4.9.11 WATER LEVEL - REACTOR VESSEL and STORAGE POOL

The restrictions on minimum water level ensure that sufficient water depth is available to remove 99% of the assumed 10% iodine gap activity released from the rupture of an irradiated fuel assembly. The minimum water depth is consistent with the assumptions of the safety analysis.

3/4.9.12 FUEL STORAGE BUILDING EMERGENCY AIR CLEANING SYSTEM

The limitations on the Fuel Storage Building Emergency Air Cleaning System ensure that all radioactive material released from an irradiated fuel assembly will be filtered through the HEPA filters and charcoal adsorber prior to discharge to the atmosphere. Operation of the system with the heaters operating for at least 10 continuous hours in a 31-day period is sufficient to reduce the buildup of moisture on the adsorbers and HEPA filters. The OPERABILITY of this system and the resulting iodine removal capacity are consistent with the assumptions of the safety analyses. ANSI N510-1980 will be used as a procedural guide for surveillance testing.

3/4.9.13 SPENT FUEL ASSEMBLY STORAGE

Restrictions on placement of fuel assemblies of certain enrichments within the Spent Fuel Pool is dictated by Figure 3.9-1. These restrictions ensure that the K_{eff} of the Spent Fuel Pool will always remain less than 0.95 assuming the pool to be flooded with unborated water. The restrictions delineated in Figure 3.9-1 and the action statement are consistent with the criticality safety analysis performed for the Spent Fuel Pool as documented in the FSAR.

3/4.9.14 NEW FUEL ASSEMBLY STORAGE

Restrictions on placement of fuel assemblies of certain enrichments within the New Fuel Storage Vault is dictated by Specification 3/4.9.14. These restrictions ensure that the K_{eff} of the New Fuel Storage Vault will always remain less than 0.95 assuming the area to be flooded with unborated water. In addition, these restrictions ensure that the K_{eff} of the New Fuel Storage Vault will always remain less than 0.98 when aqueous foam moderation is assumed. The restrictions delineated in Specification 3/4.9.14 and the action statement are consistent with the criticality safety analysis performed for the New Fuel Storage Vault as documented in the FSAR.

~~Revised by NRC letter dated 6/8/01~~

SECTION III

RETYPE OF PROPOSED CHANGES

Refer to the attached retype of the proposed changes to the Technical Specifications. The attached retype reflects the currently issued version of the Technical Specifications. Pending Technical Specification changes or Technical Specification changes issued subsequent to this submittal are not reflected in the enclosed retype. The enclosed retype should be checked for continuity with Technical Specifications prior to issuance.

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3/4.9.3 (This specification number is not used.)

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS

LIMITING CONDITION FOR OPRATION

3.9.4 The containment building penetrations shall be in the following status:

a. The equipment door closed and held in place by a minimum of four bolts,

b. A minimum of one door in each airlock is closed, however both doors of one personnel airlock may be open if:

   1) One personnel airlock door is capable of being closed, and

   2) A designated individual is available outside the personnel airlock to close the door.

c. Each penetration providing direct access from the containment atmosphere to the outside atmosphere shall be either:

   1) Closed by a manual or automatic isolation valve, blind flange, or equivalent; or

   2) Be capable of being closed by an OPERABLE automatic Containment Purge and Exhaust Isolation System; or

   3) Be capable of being closed by a designated individual available at the penetration.*

APPLICABILITY: During CORE ALTERATIONS or movement of irradiated fuel within the containment.

ACTION:

With the requirements of the above specification not satisfied, immediately suspend all operations involving CORE ALTERATIONS or movement of irradiated fuel in the containment building.

---

* A designated individual shall not be used for manual isolation of valves CAP-V1, CAP-V2, CAP-V3, and/or CAP-V4.

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS

SURVEILLANCE REQUIREMENTS

4.9.4 For the above required containment building penetrations:

a. Determine that each of the above required containment building penetrations shall be in its required condition within 100 hours prior to the start of, and at least once per 7 days during CORE ALTERATIONS or movement of irradiated fuel in the containment building, and

b. Demonstrate that the Containment Purge and Exhaust Isolation System is OPERABLE at least once every 18 months and within 10 days prior to the start of CORE ALTERATIONS or movement of irradiated fuel in the containment building by verifying that containment purge and exhaust isolation occurs on manual initiation and on a High Radiation test signal from each of the manipulator crane radiation area monitoring instrumentation channels.**

** Not required for those valves complying with Specification 3.9.4.c.1 or Specification 3.9.4.c.3.

3/4.9.9 (This specification number is not used.)

3/4.9.2 INSTRUMENTATION

The OPERABILITY of the Source Range Neutron Flux Monitors ensures that redundant monitoring capability is available to detect changes in the reactivity condition of the core.

3/4.9.3 (THIS SPECIFICATION NUMBER IS NOT USED.)

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS

The Limiting Condition for Operation (LCO) limits the consequences of a fuel handling accident in containment by limiting the potential escape paths for fission product radioactivity released within containment. The LCO requires any penetration providing direct access from the containment atmosphere to the outside atmosphere to be closed except for the OPERABLE containment purge and exhaust penetrations, the approved alternate closure methods and the containment personnel airlock.

For the approved alternate closure methods, the LCO requires that a designated individual must be available to close or direct the remote closure of the penetration in the event of a fuel handling accident. "Available" means stationed at the penetration or performing activities controlled by a procedure on equipment associated with the penetration. The inside containment fuel handling accident analysis provides assurance that manual isolation of penetration valves up to a 12-inch diameter size, within the assumed time, can be attained with the use of a designated individual. With respect to the 36-inch diameter CAP valves, a designated individual is not allowed since manual closure would most likely exceed the assumed closure time.

For the personnel airlocks (containment or equipment hatch), the LCO ensures that the airlock can be closed after containment evacuation in the event of a fuel handling accident. The requirement that the airlock door is capable of being closed requires that the door can be closed and is not blocked by objects that cannot be easily and quickly removed. As an example, the use of removable protective covers for the door seals and sealing surfaces is permitted. The requirement for a designated individual located outside of the airlock area available to close the door following evacuation of the containment will minimize the release of radioactive material.

The fuel handling accident analysis inside containment assumes both of the personnel airlock doors are open and an additional 12" diameter penetration (or equivalent area) is open. The analysis is bounded by these assumptions since all of the available activity is released within a 2 hour period.

The OPERABILITY of the Containment Purge and Exhaust System ensures that the containment vent and purge penetrations will be automatically isolated upon detection of high radiation levels within the containment. The OPERABILITY of this system is required to restrict the release of radioactive material from the containment atmosphere to the environment.

3/4.9.9 (THIS SPECIFICATION NUMBER IS NOT USED.)

3/4.9.10 and 3/4.9.11 WATER LEVEL - REACTOR VESSEL and STORAGE POOL

The restrictions on minimum water level ensure that sufficient water depth is available to remove 99% of the assumed 10% iodine gap activity released from the rupture of an irradiated fuel assembly. The minimum water depth is consistent with the assumptions of the safety analysis.

3/4.9.12 FUEL STORAGE BUILDING EMERGENCY AIR CLEANING SYSTEM

The limitations on the Fuel Storage Building Emergency Air Cleaning System ensure that all radioactive material released from an irradiated fuel assembly will be filtered through the HEPA filters and charcoal adsorber prior to discharge to the atmosphere. Operation of the system with the heaters operating for at least 10 continuous hours in a 31-day period is sufficient to reduce the buildup of moisture on the adsorbers and HEPA filters. The OPERABILITY of this system and the resulting iodine removal capacity are consistent with the assumptions of the safety analyses. ANSI N510-1980 will be used as a procedural guide for surveillance testing.

3/4.9.13 SPENT FUEL ASSEMBLY STORAGE

Restrictions on placement of fuel assemblies of certain enrichments within the Spent Fuel Pool is dictated by Figure 3.9-1. These restrictions ensure that the K_{eff} of the Spent Fuel Pool will always remain less than 0.95 assuming the pool to be flooded with unborated water. The restrictions delineated in Figure 3.9-1 and the action statement are consistent with the criticality safety analysis performed for the Spent Fuel Pool as documented in the FSAR.

3/4.9.14 NEW FUEL ASSEMBLY STORAGE

Restrictions on placement of fuel assemblies of certain enrichments within the New Fuel Storage Vault is dictated by Specification 3/4.9.14. These restrictions ensure that the K_{eff} of the New Fuel Storage Vault will always remain less than 0.95 assuming the area to be flooded with unborated water. In addition, these restrictions ensure that the K_{eff} of the New Fuel Storage Vault will always remain less than 0.98 when aqueous foam moderation is assumed. The restrictions delineated in Specification 3/4.9.14 and the action statement are consistent with the criticality safety analysis performed for the New Fuel Storage Vault as documented in the FSAR.

SECTION IV

DETERMINATION OF SIGNIFICANT HAZARDS FOR PROPOSED CHANGES

IV. DETERMINATION OF SIGNIFICANT HAZARDS FOR PROPOSED CHANGES

License Amendment Request (LAR) 01-06 proposes changes to the Seabrook Station Technical Specifications (TS) Index, TS 3/4.9.3 ("Decay Time"), TS 3/4.9.4 ("Containment Building Penetrations"), and TS 3/4.9.9 ("Containment Purge And Exhaust Isolation System"). LAR 01-06 also contains changes to Bases 3/4.9.3, Bases 3/4.9.4, and Bases 3/4.9.9 for consistency with the proposed TS changes.

The purpose of LAR 01-06 is to update the Technical Specifications by adopting portions of the improved Standard Technical Specifications (ITS), NUREG-1431, Revision 2 ("Standard Technical Specifications, Westinghouse Plants") pertaining to refueling operations.

The proposed changes to TS 3/4.9.3, "Decay Time," and associated Bases 3/4.9.3 are to delete the requirements from the Technical Specifications (TSs) and relocate them to the Seabrook Station Technical Requirements Manual (SSTR). The decay time requirement is not contained in NUREG-1431, Revision 2.

The NRC's "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" (58 FR 39312), issued in July 1993, provided a specific set of four (4) objective criteria to determine which of the design conditions and associated surveillances should be located in the TSs as limiting conditions for operation. The Final Policy Statement noted that implementation of these additional criteria, as amended to 10 CFR 50.36(c)(2)(ii), may cause some requirements presently in TSs to no longer merit inclusion in TSs.

The SSTR is a licensee-controlled document, which contains certain technical requirements, is referenced in the Seabrook Station Updated Final Safety Analysis Report, and is the implementing manual for the Technical Specification Improvement Program. Changes to these requirements are reviewed and approved in accordance with Seabrook Station Technical Specifications, Section 6.7.1.i, and as outlined in North Atlantic's administrative programs and procedures. Specifically, changes to the SSTR require review pursuant to 10 CFR 50.59 and that the changes are reviewed and approved by the Station Operations Review Committee (SORC) prior to implementation.

The proposed changes to TS 3/4.9.4, "Containment Building Penetrations," and TS 3/4.9.9, "Containment Purge and Exhaust Isolation System," are to combine both specifications under TS 3/4.9.4 in order to be similar to ITS 3.9.4 ("Containment Penetrations") where both specifications have been combined, as well as provide clarity. The proposed change will also allow removal of an administrative control currently in place with regard to the 36-inch diameter containment purge and exhaust isolation valves.

The changes to the TS Index are editorial and reflect the other changes discussed herein.

In accordance with 10 CFR 50.92, North Atlantic has concluded that the proposed changes do not involve a significant hazards consideration (SHC). The basis for the conclusion that the proposed changes do not involve a SHC is as follows:

1. The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

   The proposed changes to TS Index, TS 3/4.9.3, TS 3/4.9.4, and TS 3/4.9.9 do not adversely affect accident initiators or precursors nor do they adversely alter the design assumptions, conditions, and configuration of the facility or the manner in which the plant is operated and maintained. In addition, the proposed changes do not adversely affect the manner in which the plant responds in normal operation, transient or accident conditions nor do they change any of the procedures related to operation of the plant. Though a portion of the proposed change to TS 3/4.9.4 appears to be a relaxation to the current licensing basis, North Atlantic has incorporated administrative conservatism into TS 3/4.9.4 to assure the proposed changes, in conjunction with other TS required surveillance testing, do not alter or prevent the ability of structures, systems and components (SSCs), in particular the Containment Purge and Exhaust Isolation System, to perform its intended function to mitigate the consequences of an initiating event within the acceptance limits assumed in the Updated Final Safety Analysis Report (UFSAR).

   The proposed changes do not adversely affect the source term, containment isolation or radiological release assumptions used in evaluating the radiological consequences of an accident previously evaluated in the Seabrook Station UFSAR. Further, the proposed changes do not increase the types and amounts of radioactive effluent that may be released offsite, nor significantly increase individual or cumulative occupational/public radiation exposures.

   Therefore, it is concluded that these proposed revisions to TS Index, TS 3/4.9.3, TS 3/4.9.4, and TS 3/4.9.9 do not involve a significant increase in the probability or consequence of an accident previously evaluated.

2. The proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

   This proposed changes to TS Index, TS 3/4.9.3, TS 3/4.9.4, and TS 3/4.9.9 do not adversely affect the operation nor do they change the design basis of any plant system or component during normal or accident conditions. The proposed changes do not include any physical changes to the plant. In addition, the proposed changes do not adversely affect the function or operation of plant equipment or introduce any new failure mechanisms such that the design basis is adversely affected. The current licensing basis allows penetration isolation by manual or automatic means. The plant equipment will continue to respond per the design and analyses and there will not be a malfunction of a

new or different type introduced by the proposed changes that creates the possibility of a new or different kind of accident.

The proposed changes do not modify the facility nor do they adversely affect the plant's response to normal, transient or accident conditions. The changes do not introduce a new mode of plant operation. While these changes may afford North Atlantic operational flexibility, the changes are an enhancement and do not affect plant safety. The plant's design and design basis are not revised and the current safety analyses remains in effect.

Thus, these proposed revisions to TS Index, TS 3/4.9.3, TS 3/4.9.4, and TS 3/4.9.9 do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed changes do not involve a significant reduction in the margin of safety.

The proposed changes to TS Index, TS 3/4.9.3, TS 3/4.9.4, and TS 3/4.9.9 do not adversely affect the safety margins established through Limiting Conditions for Operation, Limiting Safety System Settings and Safety Limits as specified in the Technical Specifications nor is the plant design revised by the proposed changes. The current licensing basis allows penetration isolation by manual or automatic means.

Though a portion of the proposed change to TS 3/4.9.4 appears to be a relaxation to the current licensing basis, North Atlantic has incorporated administrative conservatism into TS 3/4.9.4 to ensure the proposed changes, in conjunction with other TS required surveillance testing, offset any potential minimal reduction in the margin of safety. North Atlantic believes that the proposed change to TS 3/4.9.4 is more conservative than that currently allowed in the improved STS, NUREG-1431, Revision 2.

Thus, it is concluded that these proposed revisions to TS Index, TS 3/4.9.3, TS 3/4.9.4, and TS 3/4.9.9 do not involve a significant reduction in a margin of safety.

Based on the above evaluation, North Atlantic concludes that the proposed changes to TS Index, TS 3/4.9.3, TS 3/4.9.4, and TS 3/4.9.9 do not constitute a significant hazard.

SECTIONS V AND VI

PROPOSED SCHEDULE FOR LICENSE AMENDMENT ISSUANCE AND EFFECTIVENESS

AND

ENVIRONMENTAL IMPACT ASSESSMENT

V. PROPOSED SCHEDULE FOR LICENSE AMENDMENT ISSUANCE AND EFFECTIVENESS

North Atlantic requests NRC review of License Amendment Request 01-06, and issuance of a license amendment by January 9, 2002, having immediate effectiveness and implementation within 90 days.

VI. ENVIRONMENTAL IMPACT ASSESSMENT

North Atlantic has reviewed the proposed license amendment against the criteria of 10 CFR 51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, nor increase the types and amounts of effluent that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, North Atlantic concludes that the proposed changes meet the criterion delineated in 10 CFR 51.22(c)(9) for a categorical exclusion from the requirements for an Environmental Impact Statement.